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November 30, 2016

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Subject: Response to 2016 CPUC Audit of PG&E's Transmission Line Victor Headquarters.
CPUC ID: TA2016-006.

Dear Mr. Daye:

From October 10, 2016 to October 13, 2016, your staff conducted a records and field audit of transmission lines under the jurisdiction of PG&E's Victor Transmission Line Headquarters. The records portion of the audit included a review of pre-audit data request responses and additional records that were provided during the audit week. During the field portion of the audit, the CPUC visited approximately 45 structures on 8 circuits.

The audit summary you sent on November 7, 2016 contained four alleged violations:

- Three issues involving GO 95, Rule 31.1, Design, Construction, and Maintenance
- One issue involving GO 95, Rule 61.6, Design, Construction, and Maintenance

You asked that PG&E advise you by December 7, 2016, of all corrective measures taken by PG&E to remedy and prevent such alleged violations. Attached below are PG&E's responses and corrective actions taken or planned to address items identified during the field and office portions of the audit.

Please contact me at 415-973-7504 if you have any questions regarding this response.

Sincerely,

/x/

Jay Singh

Director, Electric Compliance and Risk Management

cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC
Lee Palmer, Deputy Director, Office of Utility Safety, SED, CPUC
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC
Wilson Tsai, Utilities Engineer, CPUC - San Francisco Bay Area

III. Field Inspection – Undocumented Violations List

My staff observed the following violations during our field inspection. None of these violations were documented and/or addressed by PG&E during its last inspection:

GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

A switch platform was missing a pier block support on Kasson-Carbona Tower No. 2/16.

PG&E Response:

PG&E created Notification #112042030 on 10/12/2016 to address the missing pier block support for switching platform #39 on Kasson-Carbona 60 kV pole No. 2/16. The corrective maintenance was completed on 10/13/2016, the day after the issue was observed. During the previous inspection on 01/12/2016, there was no indication of missing pier blocks for any switching platforms on the Kasson-Carbona 60 kV line.

IV. Field Inspection – Documented Violations List

My staff observed the following violations during the field inspection that were documented by PG&E during its last inspection:

GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

There was a cracked concrete foundation block which supports Tesla-Tracy 500 kV Tower No. 37/248.

PG&E Response:

PG&E disagrees that conditions identified in the course of normal utility inspection and maintenance activities constitute a violation of GO 95. PG&E identified the subject conditions and created work orders for the identified condition during previous inspections.

For clarification, the identified cracked concrete foundation block supports the Weber-Tesla 230 kV structure 37/248, not the Tesla-Tracy 500 kV as stated above. The work order for the cracked concrete foundation block was created on 05/26/2016, five months prior to the October 2016 audit. The repair work is scheduled to be complete on or before 05/17/2017.

A steel leg at the base of Tesla-Tracy 115 kV Tower No. 33/220 was bent.

PG&E Response:

PG&E disagrees that conditions identified in the course of normal utility inspection and maintenance activities constitute a violation of GO 95. PG&E identified the subject conditions and created work orders for the identified condition during previous inspections.

A work order for a bent B steel leg at the base of Tesla-Tracy 115 kV structure No. 33/220 was created on 03/25/2016, seven months prior to the October 2016 audit. The repair work was completed on 04/27/2016, six months prior to the October

2016 audit. After receiving this audit report a PG&E employee, who was present during this audit, was dispatched to the area to determine if there was an additional bent steel leg on structure 33/220 or on any other structure in the area. The PG&E employee only observed the previously repaired B bent steel leg from the notification that was completed on 04/27/2016 which is still in excellent condition. Photos were taken of structures in that area to record the condition of these structures and these photos are available upon request. No additional corrective maintenance is scheduled at this time.

GO 95, Rule 61.6, Design, Construction, and Maintenance, states in part:

A minimum radial distance of six feet shall be maintained between any portion of the fence or wall and the tower

A third-party unauthorized fence runs directly underneath Tesla-Tracy 500 kV Tower No. 35/237. The fence, while not intended as a barrier for the tower, falls within the six feet minimum radial distance.

PG&E Response:

PG&E disagrees that conditions identified in the course of normal utility inspection and maintenance activities constitute a violation of GO 95. PG&E identified the subject condition and created a work order for the identified condition during a previous inspection.

For clarification, the third-party unauthorized fence is on the Weber-Tesla 230 kV structure 37/248, not on the Tesla-Tracy 500 kV as stated above. The work order for the third-party unauthorized fence was created on 05/26/2016, five months prior to the October 2016 audit. The repair work is scheduled to be complete on or before 05/17/2017.